POLLOCK | COHEN LLP

60 Broad Street, 24th Floor New York, New York 10004 (212) 337-5361

CONTACT: Adam Pollock Adam@PollockCohen.com (646) 290-7251

June 28, 2019

VIA ECF

Hon. Michael E. Wiles, U.S.B.J. United States Bankruptcy Court Southern District of New York One Bowling Green New York, NY 10004

Re: In re Boaz Bagbag, Case No.: 08 br 12667 (MEW)

Bagbag v. Summa Capital Corp., Case No.: 19 ap 01022 (MEW)

Dear Judge Wiles:

We represent Mr. Boaz Bagbag, the debtor in the above-referenced matter and write to briefly respond to Summa Capital's letter from earlier today, June 28, 2019 (dkt. #36).

Given the complicated subject matter and legal terminology, we will consider providing a Hebrew interpreter for Mr. Bagbag's deposition. And, to the extent that Summa's counsel has any further discovery-related issues, we respectfully suggest that they can call me or await my email correspondence before disturbing the Court.

Thank you for Your Honor's consideration in this matter.

Respectfully submitted,

/s/ Adam Pollock

Adam Pollock

cc:

Wayne M. Greenwald, Esq. (via ECF) (counsel for Summa Capital Corp.)